

STATEMENT OF DEFICIENCIES		(X1) PROVIDER/SUPPLIER/CLIA <b>366207</b>		(x2) multiple construction a. building _____ b. wing _____	(X3) DATE SURVEY COMPLETED <b>05/01/2019</b>
name of provider or supplier <b>ISABELLE RIDGWAY POST ACUTE CARE CAMPUS LLC</b>			street address, city, state, zip code <b>1520 HAWTHORNE AVENUE COLUMBUS OH, 43203</b>		
(X4) ID PREFIX TAG	SUMMARY STATEMENT OF DEFICIENCIES (EACH DEFICIENCY MUST BE PRECEDED BY FULL)	ID PREFIX TAG	PROVIDER'S PLAN OF CORRECTION (EACH CORRECTIVE ACTION SHOULD BE CROSS-REFERENCED TO THE APPROPRIATE)		(X5) COMPLETION
F 0000	INITIAL COMMENTS  SPECIAL FOCUS FACILITY  POST SURVEY REVISIT PARTIAL EXTENDED SURVEY  ADMINISTRATOR: Kimberly Ishwar, #6677 CERTIFIED BED CAPACITY: 96 CENSUS: 39 MEDICARE: 0 MEDICAID: 38 OTHER: 1  The following new deficiencies are based on the post survey revisit and partial extended survey for the annual survey completed 01/31/19. The facility remains out of compliance since 12/13/18.	F 0000			

laboratory director's or provider/supplier representative's signature

title

**SARAH.ROSE**

(x6) date

05/23/2019

any deficiency statement ending with an asterisk (\*) denotes a deficiency which the institution may be excused from correcting providing it is determined that other safeguards provide sufficient protection to the patients. (see instructions.) except for nursing homes, the findings stated above are disclosable 90 days following the date of survey whether or not a plan of correction is provided. for nursing homes, the above findings and plans of correction are disclosable 14 days following the date these documents are made available to the facility. if deficiencies are cited, an approved plan of correction is requisite to continued program participation.

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F 0607 F 0607 SS=F	<p>Continued From page 1</p> <p>483.12(b)(1)-(3) Develop/Implement Abuse/Neglect Policies</p> <p>§483.12(b) The facility must develop and implement written policies and procedures that:</p> <p>§483.12(b)(1) Prohibit and prevent abuse, neglect, and exploitation of residents and misappropriation of resident property,</p> <p>§483.12(b)(2) Establish policies and procedures to investigate any such allegations, and</p> <p>§483.12(b)(3) Include training as required at paragraph §483.95,</p> <p>This STANDARD is not met as evidenced by:</p> <p>Based on review of employee records, staff interviews, review of personnel file check list, and review of facility policy, the facility failed to follow their policy to obtain and submit employee fingerprints to the Bureau of Criminal Identification and Investigation (BCI &amp; I). The facility identified 17 employees (Activity Staff #45, State Tested Nursing Assistant (STNA) #46, Licensed Practical Nurse (LPN) #50, STNA #51, STNA #53, Registered Nurse (RN) #55, RN #56, STNA #58, STNA #57, STNA #59, RN #60, STNA #63, RN #64, STNA #68, STNA #71, and LPN #80 who had not had their fingerprints submitted to the BCI &amp; I. In addition, the facility identified one employee ( LPN #80 ) who</p>	F 0607 F 0607	<p>It is the facility's position that there was no negative outcome as a result of staff members not having fingerprints obtained and submitted to the Bureau of Criminal Identification and Investigation (BCI&amp;I). The facility did obtain background checks under federal regulations and guidelines but not under Ohio ORC guidelines.</p> <p>VP Clinical Services educated Administrator, HR Manager, and department managers were educated on the revised Employee Screening policy on 5/17/19.</p> <p>Facility conducted whole-house audit on all staff members to ensure that their fingerprints were submitted to the Bureau of Criminal Identification and Investigation (BCI&amp;I). This audit was completed by the Administrator on 5/2/19.</p> <p>All staff included in the sample were fingerprinted to the Bureau of Criminal Identification and Investigation (BCI&amp;I) or termed. {(STNA) #46, Licensed Practical Nurse (LPN) #50, STNA #51, STNA #53, Registered Nurse (RN) #55, RN #56, STNA #58, STNA #57, STNA #59, RN #60, STNA #63, RN #64, STNA #68, STNA #71, and LPN #80; Activity Staff #45(fingerprinted)}</p> <p>All staff were fingerprinted to the Bureau of Criminal Identification and Investigation (BCI&amp;I) or termed on or before the date of compliance. Any staff not fingerprinted to the Bureau of</p>		05/17/2019

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F 0607	<p>Continued From page 2</p> <p>did not have any background check completed upon rehire. This had the potential to affect all 38 residents residing in the facility.</p> <p>Findings include:</p> <p>Review of personnel file for Activity Staff #45 revealed date of hire was 04/25/19 and there was no evidence a BCI &amp; I fingerprint background check had been completed.</p> <p>Review of personnel file for STNA #46 revealed date of hire was 04/17/19 and there was no evidence a BCI &amp; I fingerprint background check had been completed.</p> <p>Review of personnel file for LPN #50 revealed date of hire was 04/24/19 and there was no evidence a BCI &amp; I fingerprint background check had been completed. She had a see through envelope that contained a background check from ohiobackgroundchecks.com which indicated no records found.</p> <p>Review of personnel file for STNA #51 revealed date of hire was 03/21/19 and there was no evidence a BCI &amp; I fingerprint background check had been completed.</p> <p>Review of personnel file for STNA #53 revealed date of hire was 04/10/19 and there was no evidence a BCI &amp; I fingerprint background check had been completed.</p>	F 0607	<p>Criminal Identification and Investigation (BCI&amp;I) on or before the date of compliance was termed until fingerprinted.</p> <p>Regional Director of Operations educated the Administrator on May 17, 2019 on facility's policy of "Employee Background Checks". Administrator educated HR Director and all office staff on 5/17/19 on facility's policy of "Employee Background Checks". To ensure on-going compliance, facility Administrator or designee will perform an audit of new hire files to assure fingerprints to the Bureau of Criminal Identification and Investigation (BCI&amp;I) have been completed and center is in compliance three times per week for one month with random audits thereafter. Results will be submitted to the facility's QA/QAPI program.</p>		

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F 0607	Continued From page 3  Review of personnel file for RN #55 revealed date of hire was 03/13/19 and there was no evidence a BCI & I fingerprint background check had been completed.  Review of personnel file for RN #56 revealed date of hire was 03/12/19 and there was no evidence a BCI & I fingerprint background check had been completed.  Review of personnel file for STNA #58 revealed date of hire was 03/01/19 and there was no evidence a BCI & I fingerprint background check had been completed.  Review of personnel file for STNA #57 revealed date of hire was 03/01/19 and there was no evidence a BCI & I fingerprint background check had been completed.  Review of personnel file for STNA #59 revealed date of hire was 02/08/19 and there was no evidence a BCI & I fingerprint background check had been completed.  Review of personnel file for RN #60 revealed date of hire was 02/23/18 and there was no evidence a BCI & I fingerprint background check had been completed.  Review of personnel file for STNA #63 revealed date of hire was 02/08/19 and there was no evidence a BCI & I fingerprint background check had been completed.  Review of personnel file for RN #64		F 0607		

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F 0607	<p>Continued From page 4</p> <p>revealed date of hire was 02/11/19 and there was no evidence a BCI &amp; I fingerprint background check had been completed.</p> <p>Review of personnel file for STNA #68 revealed date of hire was 04/26/19 and there was no evidence a BCI &amp; I fingerprint background check had been completed.</p> <p>Review of personnel file for STNA #71 revealed date of hire was 02/15/19 and there was no evidence a BCI &amp; I fingerprint background check had been completed.</p> <p>Review of personnel file for LPN #80 revealed date of hire was 03/22/19 and there was no evidence a BCI &amp; I fingerprint background checks had been completed. There was no evidence LPN #80 had any type of background check.</p> <p>Interview on 05/01/19 at 2:10 P.M. with Office Staff #85 revealed they used a website to complete background checks, they did not do fingerprint background checks with new hires. Office Staff #85 said she was just informed starting today that all new hires starting yesterday going forward would have fingerprint background checks conducted.</p> <p>Follow up interview on 05/01/19 at 2:24 P.M. with Office Staff #85 revealed the website they used was <a href="http://ohiobackgroundcheck.com">ohiobackgroundcheck.com</a>. Office Staff #85 was unsure how long the company</p>		F 0607		

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F 0607	<p>Continued From page 5</p> <p>had been using the website because she started in January 2019. They had been conducting background checks through the website on line and did not have employees finger printed. Office Staff #85 verified all 17 employees hired starting 02/01/19 through 05/01/19 did not have finger prints done as part of their background check.</p> <p>Interview on 05/01/19 at 2:35 P.M. with Office Staff #85 revealed upon rehire on 03/22/19, LPN #80 did not have a background check completed. LPN #80 was a rehire and had a background check on 08/27/18.</p> <p>Review of the facility's new employee handbook dated 05/01/03 revealed all employees would be required to undergo criminal background checks.</p> <p>Review of the undated Personnel File Checklist form revealed BCI &amp; I fingerprint results would be kept in a sealed envelope.</p> <p>Interview on 05/01/19 at 3:00 P.M. with the Administrator revealed the facility did not have a policy and procedure on completion of background checks. They followed State and Federal guidelines.</p> <p>A follow up interview on 05/01/19 at 3:30 P.M. with the Administrator verified the company had been doing background checks on line and no finger prints were</p>		F 0607		

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F 0607	Continued From page 6  obtained or checked with BCI & I. She stated they developed a new policy and were going to start today, 05/01/19.  Review of the facility's policy titled "Abuse: Abuse Prevention Policy & Procedure," dated 01/01/16, revealed the facility would follow State and Federal guidelines to prevent abuse, neglect, mistreatment, exploitation, and misappropriation of property. All potential new employees were screened for history of abuse, neglect, or mistreatment of residents. Criminal background checks were conducted per the facility's policy and procedure. Potential employees or volunteers with negative findings would not be hired.  Review of the facility's policy titled "Employee Background Checks," dated 05/01/19 revealed all employees would have a background check prior to starting work. Employees would be offered a position contingent on completion of background check and no disqualifying criminal record. Employee would complete background check through preferred vendor of the community.		F 0607		

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F 0835 F 0835 SS=F	<p>Continued From page 7</p> <p>483.70 Administration §483.70 Administration.</p> <p>A facility must be administered in a manner that enables it to use its resources effectively and efficiently to attain or maintain the highest practicable physical, mental, and psychosocial well-being of each resident.</p> <p>This STANDARD is not met as evidenced by:</p> <p>Based on review of employee personnel records, review of the Ohio Attorney General's website, review of the abuse policy and procedures and staff interviews, the facility failed to be administered in a manner to use its resources effectively and efficiently to maintain the highest well-being of each resident by failing to follow their policies to obtain and submit employee fingerprints to the BCI &amp; I. The facility identified 17 employees (Activity Staff #45, State Tested Nursing Assistant (STNA) #46, Licensed Practical Nurse (LPN) #50, STNA #51, STNA #53, Registered Nurse (RN) #55, RN #56, STNA #58, STNA #57, STNA #59, RN #60, STNA #63, RN #64, STNA #68, STNA #71, and LPN #80 who had not had their fingerprints submitted to the BCI &amp; I. In addition, the facility identified one employee ( LPN #80 ) who did not have any background check completed upon rehire. This had the potential to affect all 38 residents residing in the facility.</p>	F 0835 F 0835	<p>F835</p> <p>It is the facility's position that there was no negative outcome as a result of staff members not having fingerprints obtained and submitted to the Bureau of Criminal Identification and Investigation (BCI&amp;I). The facility did obtain background checks under federal regulations and guidelines but not under Ohio ORC guidelines.</p> <p>Facility conducted whole-house audit on all staff members to ensure that their fingerprints were submitted to the Bureau of Criminal Identification and Investigation (BCI&amp;I). This audit was completed by the Administrator on 5/2/19.</p> <p>All staff included in the sample were fingerprinted to the Bureau of Criminal Identification and Investigation (BCI&amp;I) or termed. Any staff not fingerprinted to the Bureau of Criminal Identification and Investigation (BCI&amp;I) on or before the date of compliance was suspended until fingerprinted. {(STNA) #46, Licensed Practical Nurse (LPN) #50, STNA #51, STNA #53, Registered Nurse (RN) #55, RN #56, STNA #58, STNA #57, STNA #59, RN #60, STNA #63, RN #64, STNA #68, STNA #71, and LPN #80; Activity Staff #45(fingerprinted)}</p> <p>All staff were fingerprinted to the Bureau of Criminal Identification and Investigation (BCI&amp;I) or termed on or before the date of compliance.</p>		05/17/2019

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F 0835	<p>Continued From page 8</p> <p>Findings include:</p> <p>Review of personnel file for Activity Staff #45 revealed date of hire was 04/25/19 and there was no evidence a BCI &amp; I fingerprint background check had been completed.</p> <p>Review of personnel file for STNA #46 revealed date of hire was 04/17/19 and there was no evidence a BCI &amp; I fingerprint background check had been completed.</p> <p>Review of personnel file for LPN #50 revealed date of hire was 04/24/19 and there was no evidence a BCI &amp; I fingerprint background check had been completed. She had a see through envelope that contained a back ground check from ohiobackgroundchecks.com which indicated no records found.</p> <p>Review of personnel file for STNA #51 revealed date of hire was 03/21/19 and there was no evidence a BCI &amp; I fingerprint background check had been completed.</p> <p>Review of personnel file for STNA #53 revealed date of hire was 04/10/19 and there was no evidence a BCI &amp; I fingerprint background check had been completed.</p> <p>Review of personnel file for RN #55 revealed date of hire was 03/13/19 and there was no evidence a BCI &amp; I fingerprint background check had been completed.</p>		F 0835	<p>Any staff not fingerprinted to the Bureau of Criminal Identification and Investigation (BCI&amp;I) on or before the date of compliance was suspended until fingerprinted.</p> <p>Regional Director of Operations educated the Administrator on May 17, 2019 on facility's policy of "Employee Screening".</p> <p>Administrator educated HR Director and all office staff on 5/17/19 on facility's policy of "Employee Screening".</p> <p>To ensure on-going compliance, facility Administrator or designee will perform an audit of new hire files to assure fingerprints to the Bureau of Criminal Identification and Investigation (BCI&amp;I) have been completed and center is in compliance three times per week for one month with random audits thereafter. Results will be submitted to the facility's QA/QAPI program.</p>	

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F 0835	Continued From page 9  Review of personnel file for RN #56 revealed date of hire was 03/12/19 and there was no evidence a BCI & I fingerprint background check had been completed.  Review of personnel file for STNA #58 revealed date of hire was 03/01/19 and there was no evidence a BCI & I fingerprint background check had been completed.  Review of personnel file for STNA #57 revealed date of hire was 03/01/19 and there was no evidence a BCI & I fingerprint background check had been completed.  Review of personnel file for STNA #59 revealed date of hire was 02/08/19 and there was no evidence a BCI & I fingerprint background check had been completed.  Review of personnel file for RN #60 revealed date of hire was 02/23/18 and there was no evidence a BCI & I fingerprint background check had been completed.  Review of personnel file for STNA #63 revealed date of hire was 02/08/19 and there was no evidence a BCI & I fingerprint background check had been completed.  Review of personnel file for RN #64 revealed date of hire was 02/11/19 and there was no evidence a BCI & I fingerprint background check had been completed.  Review of personnel file for STNA #68		F 0835		

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F 0835	<p>Continued From page 10</p> <p>revealed date of hire was 04/26/19 and there was no evidence a BCI &amp; I fingerprint background check had been completed.</p> <p>Review of personnel file for STNA #71 revealed date of hire was 02/15/19 and there was no evidence a BCI &amp; I fingerprint background check had been completed.</p> <p>Review of personnel file for LPN #80 revealed date of hire was 03/22/19 and there was no evidence a BCI &amp; I fingerprint background checks had been completed. There was no evidence LPN #80 had any type of background check.</p> <p>Interview on 05/01/19 at 2:10 P.M. with Office Staff #85 revealed they used a website to complete background checks, they did not do fingerprint background checks with new hires. Office Staff #85 said she was just informed starting today that all new hires starting yesterday going forward would have fingerprint background checks conducted.</p> <p>Follow up interview on 05/01/19 at 2:24 P.M. with Office Staff #85 revealed the website they used was ohiobackgroundcheck.com. Office Staff #85 was unsure how long the company had been using the website because she started in January 2019. They had been conducting background checks through the website on line and did not have employees finger printed. Office Staff #85</p>		F 0835		

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F 0835	<p>Continued From page 11</p> <p>verified all 17 employees hired starting 02/01/19 through 05/01/19 did not have finger prints done as part of their background check.</p> <p>Interview on 05/01/19 at 2:35 P.M. with Office Staff #85 revealed upon rehire on 03/22/19, LPN #80 did not have a background check completed. LPN #80 was a rehire and had a background check on 08/27/18.</p> <p>Review of the facility's new employee hand book dated 05/01/03 revealed all employees would be required to undergo criminal background checks.</p> <p>Review of the undated Personnel File Checklist form revealed BCI &amp; I fingerprint results would be kept in a sealed envelope.</p> <p>Interview on 05/01/19 at 3:00 P.M. with the Administrator revealed the facility did not have a policy and procedure on completion of background checks. They followed State and Federal guidelines.</p> <p>A follow up interview on 05/01/19 at 3:30 P.M. with the Administrator verified the company had been doing background checks on line and no finger prints were obtained or checked with BCI &amp; I. She stated they developed a new policy and were going to start today, 05/01/19.</p> <p>Review of the Ohio Attorneys General</p>		F 0835		

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F 0835	<p>Continued From page 12</p> <p>web-site (ohioattorneygeneral.gov) revealed BCI&amp;I compares fingerprints received against database of criminal fingerprints to determine if there is a criminal record. The site identified all fingerprints must be submitted to BCI&amp;I electronically through a webcheck or a scan card.</p> <p>Review of the facility's policy titled "Abuse: Abuse Prevention Policy &amp; Procedure," dated 01/01/16, revealed the facility would follow State and Federal guidelines to prevent abuse, neglect, mistreatment, exploitation, and misappropriation of property. All potential new employees were screened for history of abuse, neglect, or mistreatment of residents. Criminal background checks were conducted per the facility's policy and procedure. Potential employees or volunteers with negative findings would not be hired.</p> <p>Review of the facility's policy titled "Employee Background Checks," dated 05/01/19 revealed all employees would have a background check prior to starting work. Employees would be offered a position contingent on completion of background check and no disqualifying criminal record. Employee would complete background check through preferred vendor of the community.</p>		F 0835		